Committee on Resources,

Subcommittee on Forests & Forest Health

forests - - Rep. Scott McInnis, Chairman
U.S. House of Representatives, Washington, D.C. 20515-6205 - - (202) 225-0691

Witness Statement

Testimony before the House Resources Committee
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In Opposition to H.R. 2119, the National Historic Forests Act of 2001
June 19, 2001

On behalf of American Lands Alliance, representing grassroots forest activists and organizations from around the nation, we urge the Committee to reject H.R. 2119, because the bill does not address the priority need for protecting and restoring the National Forests. Intensive management is part of the problem, not the solution. While we strongly disagree with the specific proposals found in H.R. 2119, we agree that addressing the restoration of degraded forest landscapes is an extremely important topic that merits further discussion and ultimately, congressional action.

Concerns With H.R. 2119

1. The proposal to create a new land management designation of "National Historic Forest" in Sec. 101 is unnecessary. The proposed process for designation will be expensive and time consuming for agency officials and the concerned public while offering no discernable benefits.

2. The preparation of management plans for historic forests as required by Sec. 102 of the bill outside of the established forest planning process will lead to duplication of work and require considerable staff time and funding better spent on ecologically beneficial restoration projects.

3. The "special consideration" of certain uses in these management plans in Sec. 102 (b) (2) overemphasize economic considerations while placing insufficient emphasis on protecting ecosystem services such as water quality and maintaining the viability of fish and endangered species across their natural ranges.

4. The ability for the Secretary to unilaterally revise or revoke a management plan in Sec. 102 (c) undermines the public involvement process. All decisions and management plans affecting plans should have a mechanism for public involvement.

5. The restoration goal found in Sec. 103 puts resource extraction on par with legitimate restoration activities. Excessive resource extraction and intensive management is the primary cause of forest degradation. Continuing resource extraction as part of restoration is likely to undermine the ecological objectives of the program and require additional ecological restoration in the future.

6. Overall, while the goal of restoration is needed and worthwhile, there also needs to be specific scientific principles and management criteria included in the bill to ensure that the resulting projects do not do more harm than good.

7. The direction to use cost-effective restoration methods in Sec. 104 may lead to commodity extraction to pay for needed restoration projects. Commercial logging is never the most cost effective method when all factors are considered. In fact, it is one of the contributing reasons why forests need to be "restored" today. Ecological restoration will, in general, not generate significant revenue or by-products of economic value. Restoration work will require an investment by Congress -- a very wise investment -- that will create jobs and maintain the fundamental ecosystem services such as clean water supplies upon which human society and the entire economy is based.

8. Amending National Forest Management plans (Sec. 105) to make them consistent with the approved management plans for historic forests will require citizens to be involved with two separate planning processes for the same area and create potential management conflicts.

9. The National Historic Forest Restoration Fund (Sec. 107) will create a new incentive for resource extraction on the National Forests and encourage revenue generating projects under the guise of restoration. As is currently the case with the KV, Brush Disposal and Salvage funds, off-budget funds create an incentive for the agency to maximize revenue because it gets to keep 100% of the money.

10. Funds from the Land and Water Conservation Fund (Sec. 107) should not be used to create and support the Historic Forest Restoration Fund. The bill proposes to divert $675 million over the life of the bill that could be better spent acquiring threatened habitats.

11. Accepting donations (Sec. 108) and giving due consideration to the expressed intentions of the donor could lead to undue influence being exerted by donors on the Forest Service.

12. Title II of H.R. 2119 creates an unnecessary National Advisory Council on Forest Restoration which duplicates responsibilities now held by the Forest Service. All positions, with the exception of the Chief of the Forest Service would be political appointees of the Bush Administration. This does not ensure a fair or balanced participant make up nor are their requirements to ensure that the scientific, forest workers or environmentalists are represented. This complete lack of fairness is perhaps why the bill exempts this Committee from the Federal Advisory Committee Act.

13. Title III of the bill creates Local Management Advisory Committees which fails to adequately allow representation of the full range of scientific, worker and environmental interests concerned about recreation issues. This would also duplicate similar Resource Advisory Committees created by the county payments legislation. The emphasis on foresters on the committee indicates a strong bias for certain types of restoration (salvage and thinning) over others. A wildlife biologist might be more interested in the reintroduction of endangered species, while a hydrologist might be more focused on removing roads to restore watersheds. Again, this committee would not have to comply with the Federal Advisory Committee Act to ensure fair representation.

In conclusion, we are strongly opposed to H.R. 2119 and would urge the Committee to reject it in its entirety. However, we are very interested in the topic of restoration and are working to develop a model that we hope can help benefit Congress and the land management agencies as they move forward to address this critical issue.

A Vision and Principles for Forest Restoration

Fully functioning ecosystems are the Earth's life support. Forest ecosystems provide clean drinking water,

purify our air and regulate our climate. These vital benefits are literally our stock of "natural capital" that is necessary to sustain all life. Provided that the forests' natural processes are functioning, they will supply a steady flow of these ecological services.

In most cases natural capital is neither owned nor marketed. While the values of these services are understood, clean water and air, for example, are often considered "free for the taking." Safeguarding these services and the forests that provide them are not usually the priority goal for land management decisions. Current economic incentives and a focus on resource extraction often work at cross-purposes with protecting these forest values and result in the rapid depletion of natural capital. Consequently, these once enormously productive natural systems are unraveling, degrading water quality, compromising the health of rivers and streams, driving to extinction the last wild fish populations and severely impairing the ability of forests to regulate the climate.

Decades of industrial forest practices have taken their toll on this country's forests and the communities and workforces that depend on them for their livelihood. Intensive management restoration prescriptions only perpetuate the further destruction of systems. Society's approach has been one-sided, focusing on taking from what seemed to be an endless supply of timber. Now it is time for society to give something back and focus on restoring the ecological integrity of our forests that will in turn secure our well being and that of future generations.

There is a greater scientific understanding of the connections between land management actions and their negative impacts on the ability of a forest to provide vital ecological services. There are also good ecological economic models that more fully account for the costs and benefits of land management decisions. These models should be used to guide appropriate policy, incentives and mechanisms for investing in the landscape through ecological restoration.

Recently, decision-makers and the interested public have recognized the need to restore our forests and federal agencies have developed plans for restoration activities. Central to the debate is the question of whether all proposed "restoration" activities are truly beneficial to the land and the lives that depend on them. Most notable is the National Fire Management Plan, which has raised many concerns about the plan's approach to forest restoration as well as concerns with other federal agency restoration efforts. Perhaps most important is the need to proceed with extreme caution. Just because humans have caused the current level of degradation, we should not assume that human intervention can always necessarily solve these problems.

Several questions need to be answered in order develop a credible science-based restoration agenda including: 1) defining ecological forest restoration and the principals and criteria on which this work should be carried out, 2) using these principles and criteria to guide implementation of the National Fire Plan so that it is ecologically sound, 3) identifying who will do the work, 4) identifying what skills are needed and what processes will allow for equitable participation by rural communities and mobile workforces, and 5) what is the transition strategy by which these goals can be achieved.

The following restoration goals and principles are under development to answer these questions and set forth a vision and framework for addressing these issues. This policy statement is national in scope and recognizes the need to develop supplemental regional principals and criteria that would address differences in forest ecosystems and further involve regional partners.

Forest Restoration Principle

Forest Restoration requires an integrated, comprehensive approach which includes preserving and protecting intact landscapes; letting the land heal itself, and, only where necessary, helping it to do so. From a basis of ecological integrity we can reestablish sustainable human connections to the land through quality restoration jobs and conservation-based economies, as well as provide an economic framework to restore and sustain ecological integrity and community viability.

Ecological Forest Restoration Principle

Ecological forest restoration is the process of assisting forest ecosystem recovery so that ecosystem integrity is enhanced and natural processes and disturbances can function unimpaired. Successful forest restoration has the potential to re-establish fully functioning ecosystems.

The goal of forest restoration is to enhance ecological integrity by restoring natural processes and resilience. An ecological integrity approach encompasses advantages of historical models while recognizing that ecosystems are dynamic and change over time . Focusing on enhancing ecological integrity allows us to be guided by the needs of ecosystems rather than forcing our needs onto the landscape.

Because we do not fully understand the potential impacts of restoration, all projects must be guided by the precautionary principle: if a restoration activity has a high risk of ecological damage and weak scientific support, then the activity should not go forward. This will be considered before deciding which type of restoration approach to use. Ecological restoration, based on a restoration needs assessment, will be approached on a scale from least invasive to more invasive.

Ecological Economics, Communities and Workforce Principle

Ecological restoration is an important component of an ecologically sound, socially-just forest economy. It has the potential to support the long-term viability of communities at an appropriate scale, while fostering a culture of environmental sustainability. However, current economic incentives drive land managers, companies and consumers to rapidly deplete natural resources and social stability, imposing heavy costs upon the public, taxpayers and future generations without our consent. These incentives must be removed and replaced with positive incentives to protect and restore ecological integrity, within a framework that more fully accounts for the costs and benefits of land management actions.

A highly-skilled, well-paid workforce is essential for restoration to meet high ecological standards. This requires a commitment to regional training capacity, skill certification, consistent funding over decades and workers' rights to organize and bargain collectively. The process of advancing ecological restoration must be open, inclusive and transparent, and become a practical outlet for breaking down class, culture, gender, language and religious barriers.

Ecological Forest Restoration

1) Precautionary Principle: Because ecological systems are inherently complex and dynamic, it is impossible to accurately predict all the consequences of our actions, even well- intentioned restoration actions. Therefore, if an area proposed for restoration presents a risk of being negatively impacted by restoration actions, or if a specific restoration action poses a high risk of ecological damage or has weak scientific support, then the proposed area or action will not go forward, or the restoration activity will be implemented in incremental steps on an experimental basis. Active restoration should be implemented in situations where passive restoration might lead to the destruction or loss of natural processes, a species, stream system or

rare representative ecosystem within a particular area.

Precautionary Criteria:

a) Restoration plans will take a conservative approach.

b) Restoration projects that do not include money for assessment, monitoring and evaluation will not proceed.

c) Restoration plans must be open to revision based on monitoring, evaluation, new ideas and new science.

d) Restoration plans must minimize risks to ecosystem integrity.

e) The precautionary principle will be applied in two stages:

i) In determining where to apply restoration activities

ii) In determining what type of restoration technique to apply once an area is chosen for restoration

f) Intensive management such as commercial logging should never be viewed as a way to achieve restoration.

2) Prioritization Principle: There are three which define the range of forest restoration methods:

1) preservation, the protection of relatively intact natural areas and core refugia as sources of biodiversity, for example old growth forests and roadless areas, where restoration is largely unnecessary, or reference landscapes needed as a source of baseline information;

2) passive restoration, the cessation of ecologically degrading activities, such as intensive logging, grazing and recreation, and excessive suppression of fire and forest pathogens, to allow natural recovery processes to proceed unhindered; and

3) active restoration, direct human intervention to reintroduce (or secure) natural processes or at risk species in cases where a) ecosystem composition, structure and function are degraded or suppressed by factors such as compacted soils, channelized streams, exclusion of endemic pathogens etc., or b) human-induced ecosystem changes pose imminent threats to intact natural areas, including roads and trails, and exotic invasives.

In determining restoration activities, priority must be given to protection of intact areas, and restoring areas of highest ecological integrity. In these areas, passive restoration will be encouraged, and active restoration will be applied judiciously based on degree of degradation and ecological need, emphasizing the least intensive interventions which are likely to provide the greatest ecological benefit, while minimizing management-induced ecological risks and costs.

Active restoration will not be applied to intact areas and core refugia, such as old-growth forests, roadless or wilderness areas. Restoration of all kinds should proceed most rapidly in areas where, and using methods for which there is a high degree of consensus among key stakeholders that such restoration plans will

enhance ecological integrity. Key stakeholders include scientists, communities of interest (environmental, worker, community), communities of place, and managers of affected land ownerships.

Adaptive Management Principle: Ecological forest restoration of any type, at any scale is a process of adaptive management. Because of high levels of complexity, uncertainty and risk, any restoration requires an approach that is cautious, flexible and able to respond to change and new information. Acceptable restoration projects include a transparent public process that provides for: assessment, implementation, monitoring, evaluation and adaptation.

Economic Framework Principle: Incentives that are inconsistent with achieving ecological integrity must be eliminated and replaced with positive economic incentives to protect and restore ecological integrity, within a framework that accounts for the costs and benefits associated with natural capital.

Community/Workforce Sustainability Principle: Restoration must foster a sustainable human relationship to the land that provides for ecological integrity, social and economic justice for workers and communities, and a culture of preservation and restoration. In turn, effective restoration depends on strong, healthy and diverse communities and a skilled, committed workforce.

Participatory Principle: Meaningful involvement for a diversity of communities, interest groups and other participants (at local, regional, and national levels) will be achieved through open, inclusive and transparent decision-making processes with recognition of and respect for differences.

Thank you for this opportunity to testify and I am happy to answer any questions from the Committee.

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